

February 4, 2014

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: **EX PARTE PRESENTATION**
Misuse of Internet Protocol (IP) Captioned Telephone Service;
Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities
CG Docket Nos. 13-24, 03-123

Dear Ms. Dortch:

On January 31, 2014, representatives of Hamilton Relay, Inc. (“Hamilton”) and Captel Inc./Ultratec Inc. (“Ultratec”) met with Commission staff from the Consumer & Governmental Affairs Bureau (“CGB”) and the Office of the Managing Director (“OMD”). Participating on behalf of Hamilton were Dixie Ziegler, Anne Girard, and the undersigned counsel for Hamilton. Participating on behalf of Ultratec were Rob Engelke, Tim Engelke, and Kevin Colwell. Commission staff present at the meeting were Karen Peltz Strauss, Gregory Hlibok, Eliot Greenwald, Elaine Gardner, and Robert Aldrich of CGB, and David Schmidt and Andrew Mulitz of OMD.

During the meeting, the parties requested further information about the status of the Office of Management and Budget (“OMB”) approval process in connection with the Internet Protocol Captioned Telephone Service (“IP CTS”) *Report and Order* adopted on August 26, 2013 in this proceeding.¹ Hamilton also reiterated the points made in its January 2, 2014 Petition for Clarification or, in the Alternative, Reconsideration, regarding the registration requirements for interim IP CTS registered users.

¹ *Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, CG Docket Nos. 13-24, 03-123, 28 FCC Rcd 13420 (rel. Aug. 26, 2013), *review pending sub nom.* Sorenson Communications, Inc. v. FCC, No. 13-1246 (D.C. Cir. filed Sept. 6, 2013).

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Hamilton also encouraged the Commission not to move forward with proposals in the August 26, 2013 *Further Notice of Proposed Rulemaking* (“*FNPRM*”) in this proceeding until the OMB process has been completed and the pending court challenge to the Report and Order have been resolved. While there may be portions of the *FNPRM* that are appropriate to examine further, such as mandatory minimum standards for IP CTS providers, the Commission generally must examine the impact of the current rules, once they have been approved by OMB and implemented over a 180-day period by providers, before deciding that additional rules are necessary for IP CTS providers.

This filing is made in accordance with Section 1.1206(b)(1) of the Commission’s rules, 47 C.F.R. § 1.1206(b)(1). In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

/s/ David A. O’Connor

Counsel for Hamilton Relay, Inc.

cc (via e-mail): Participants